



July 17, 2003

**Filed Electronically Via ECFS**

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

Dear Ms. Dortch:

Montana Wireless, Inc. ("MWI") hereby submits its Interim Progress Report on implementation of E911 access over its digital wireless network, pursuant to the Commission's *Order to Stay in CC Docket No. 94-102*, released on July 26, 2002.

**Background**

MWI is a wholly owned subsidiary of Blackfoot Telephone Cooperative, Inc. ("Blackfoot"), a rural telephone cooperative that provides local exchange telephone and other telecommunications services in the Missoula, Montana area. MWI is the licensee of station WPO1210 in the Broadband Personal Communications Service ("PCS"). Station WPO1210 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation ("GTE"), on June 23, 1995, for the Spokane-Billings Major Trading Area ("MTA"). On November 1, 1996, the Commission approved the application to partition to MWI a portion of GTE's License for the Spokane-Billings MTA, to include the Missoula and Kalispell Basic Trading Areas ("BTAs") and Powell County, from the Butte BTA. MWI utilizes Nortel's CDMA equipment for its PCS network.

MWI is committed to complying with Commission requirements regarding TTY, Enhanced 911 ("E911"), Automatic Location Identification ("ALI") and Communications Assistance for Law Enforcement Act ("CALEA"). However, in order to fully comply with these government mandates, MWI must upgrade its system. As the Commission is aware from MWI's TTY Quarterly Reports, due to Nortel's discontinuation of its support of MWI's current dual-load wireless and wireline traffic switch, MWI must purchase a

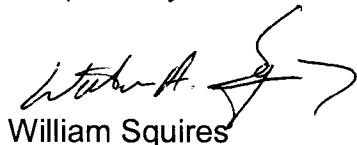
second switch and split the traffic from the existing switch. Before MWI can split the traffic, it must upgrade the system software to LWW007 (the equivalent of wireless MTX9). Once the switch split is achieved, MWI must upgrade the system software a second time to MTX 10. Because of Nortel's decision to no longer support its dual mode switch, MWI has been put in the unusual situation of having to perform a technically complex switch split seamlessly. Nevertheless, MWI remains committed to doing so, as to comply with the Commission E911, TTY, ALI and CALEA mandates. MWI expects completion of that implementation and testing during first quarter 2004.

### **E911 Phase II Location Technology Implementation Progress**

1. Type of Technology: As described in its November 9, 2000 Implementation Report, MWI intends to implement a handset-based solution utilizing Qualcomm's GPS One technology, in conjunction with GTE/Telecommunications Services, Inc.'s ("TSI's") PSAP solution. This technology will be used over MWI's entire network. To date there has not been a PSAP request for Wireless Phase II E911.
2. Testing and Verification: Thus far, MWI has not performed any testing. Testing is not possible until the switch split and software upgrades are complete. However, based on the initial tests, the manufacturers' of the product described above indicate that the performance will exceed Commission requirements. When the system is ready, MWI will begin testing by first segregating its service area into separate environments: urban, suburban, rural flatland, rural mountainous and areas served by repeaters. Test calls will be placed from various locations, including stationary locations, inside and outside of buildings, and mobile locations. Location information will be compared to handheld GPS readings. Testing will then be arranged with local PSAPs upon receipt of valid E911 requests. All testing will be in accordance with the Commission's *OET Bulletin No. 71*, or equivalent methods and procedures.
3. Implementation Details and Schedule: MWI will adhere to the implementation schedule outlined for Tier III handset-based providers in the *Order to Stay in CC Docket 94-102*. During first quarter 2002 MWI began selling and activating ALI-capable handsets. Today MWI offers six different handsets, four of which are ALI-capable. The remaining two handsets are scheduled to be replaced by the manufacturers in August 2003 with ALI-capable versions.
4. PSAP Interface: MWI will use the services of GTE/TSI, its current SS7 services provider. A data link will be established from MWI's serving Signal Control Point ("SCP") to the ALI database serving the local PSAPs, and between the SCP and a local server collecting the results of the location query. The voice portion will be forwarded to the selective router, as usual. The location will be sent to the ALI database along with the number of the party initiating the E911 call. The PSAP will receive this information over existing data links.

5. Existing Handsets: MWI will continue to keep abreast of its current handset suppliers' location identification deployment plans. These suppliers currently include Kyocera, Motorola and Nokia.
6. Location of Non-Compatible Handsets: MWI will identify active non-compatible handsets during second quarter 2005. At that time MWI will encourage those customers with outdated technology to move to compatible models. If MWI finds that a substantial number of customers still have non-compatible equipment, it will consider a promotion to encourage customers to move to newer equipment. MWI will tout the new technology advantages and recommend that non-compatible handsets be restricted for use at campus locations, i.e., indoor locations in manufacturing plants and elsewhere where MWI will be basically providing fixed service. MWI will use a "best practices" solution in connection with providing ALI to non-compatible handsets, assuming, of course, that the PSAP is equipped to utilize Phase II ALI data. However, MWI believes that most handsets will be compatible by December 31, 2005 because the average handset lasts two years or less and manufacture warranties expire after one year.
7. Other Information: While MWI has actively sold and activated ALI-capable handsets since first quarter 2001, it is important to note this service will not be operational until the switch split and upgrades are complete. MWI projects that those network changes and upgrades will be complete during first quarter 2004. As of the present, MWI has not received any PSAP requests for either Phase I or Phase II deployment.

Respectfully submitted,



William Squires  
Senior Vice President and General Counsel  
Montana Wireless, Inc. d/b/a Blackfoot Communications  
1221 North Russell Street  
Missoula, MT 59808-1805  
406-541-5000  
406-541-5099 (fax)